

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

FELIX ANGEL FALCON FIGUEROA  
MYRNA JURADO RODRIGUEZ

DEBTORS

CASE NO. 15-04065-MCF

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN  
AND CERTIFICATE OF SERVICE**

**TO THE HONORABLE COURT:**

NOW COME, **FELIX ANGEL FALCON FIGUEROA and MYRNA JURADO RODRIGUEZ**, debtor in the above captioned case, through the undersigned attorney, and very respectfully state and pray:

1. The debtors are hereby submitting a proposed amended Plan, dated August 13, 2015, herewith and attached to this motion.

2. This proposed amended Plan is filed to eliminate provision to protect co-debtor, provide for secured creditor Midfirst Bank (Proof of Claim 4-1), and provide for secured creditor Scotiabank of Puerto Rico (Proof of Claim 5-1).

**WHEREFORE** debtor respectfully requests the confirmation of the requested amended Plan, dated August 13, 2015.

**I CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 13<sup>th</sup> day of August, 2015.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONER  
PO BOX 186 CAGUAS PR 00726  
TEL. NO. (787) 744-7699

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 3:15-bk-4065

FALCON FIGUEROA, FELIX ANGEL & JURADO RODRIGUEZ, MYRNA

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.  
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>8/13/2015</u> <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION      Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<p><b>I. PAYMENT PLAN SCHEDULE</b></p> <p>\$ <u>200.00</u> x <u>12</u> = \$ <u>2,400.00</u>                  \$ <u>575.00</u> x <u>48</u> = \$ <u>27,600.00</u>                  \$ _____ x _____ = \$ _____                  \$ _____ x _____ = \$ _____                  \$ _____ x _____ = \$ _____</p> <p style="text-align: right;">TOTAL: \$ <u>30,000.00</u></p> <p>Additional Payments:                  \$ _____ to be paid as a LUMP SUM                  within _____ with proceeds to come from:  <input type="checkbox"/> Sale of Property identified as follows:                  _____  <input type="checkbox"/> Other:                  _____</p> <p>Periodic Payments to be made other than, and in                  addition to the above:                  \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>30,000.00</u></p> <p><b>III. ATTORNEY'S FEES</b>                  (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee                  Disclosure Statement: \$ <u>2,705.00</u></p> <p>Signed: <u>/s/ FELIX ANGEL FALCON FIGUEROA</u>                  Debtor</p> <p><u>/s/ MYRNA JURADO RODRIGUEZ</u>                  Joint Debtor</p>	<p><b>II. DISBURSEMENT SCHEDULE</b></p> <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____                  B. SECURED CLAIMS:  <input type="checkbox"/> Debtor represents no secured claims.  <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:                  1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS:                  Cr. <u>Scotiabank De Puert</u> Cr. _____ Cr. _____                  # <u>Claim 5-1</u> # _____ # _____                  \$ <u>728.64</u> \$ _____ \$ _____                  2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims:                  Cr. _____ Cr. _____ Cr. _____                  # _____ # _____ # _____                  \$ _____ \$ _____ \$ _____                  3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:                  Cr. _____ Cr. _____ Cr. _____                  # _____ # _____ # _____                  \$ _____ \$ _____ \$ _____                  4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:                  _____                  5. <input type="checkbox"/> Other:                  _____                  6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:  <u>Scotiabank De Puert</u>                  C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.                  11 U.S.C. § 507 and § 1322(a)(2)                  D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.                  1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____  <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____                  Cr. _____ Cr. _____ Cr. _____                  # _____ # _____ # _____                  \$ _____ \$ _____ \$ _____                  2. Unsecured Claims otherwise receive PRO-RATA disbursements.                  OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)                  * Debtor(s) consent(s) to the LIFT of STAY in favor of secured creditor                  Midfirst Bank (POC 4-1). Trustee will not make disbursements to                  secured creditor Midfirst Bank (POC 4-1).</p>

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Attorney for Debtor R. Figueroa Carrasquillo Law Office

Phone: (787) 744-7699

Label Matrix for local noticing  
0104-3  
Case 15-04065-MCF13  
District of Puerto Rico  
Old San Juan  
Thu Aug 13 16:44:21 AST 2015

MIDFIRST BANK  
999 N.W. GRAND BLVD.  
OKLAHOMA CITY, OK 73118-6051

SCOTIABANK OF PUERTO RICO  
MARTINEZ & TORRES LAW OFFICES, P.S.C.  
PO BOX 192938  
SAN JUAN, PR 00919-3409

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

American InfoSource LP as agent for  
T Mobile/T-Mobile USA Inc  
PO Box 248848  
Oklahoma City, OK 73124-8848

Capital One Bank (USA), N.A.  
PO Box 71083  
Charlotte, NC 28272-1083

Capital One Bank Usa N  
15000 Capital One Dr  
Richmond, VA 23238-1119

First Bank De Puerto Rico  
PO Box 9146  
San Juan, PR 00908-0146

First Bank Of Puerto Rico  
PO Box 9146  
San Juan, PR 00908-0146

MIDFIRST BANK  
ATTY JUAN B SOTO  
1353 LUIS VIGOREAUX AVE  
PMB 270  
GUAYNABO PR 00966-2715

MONEY EXPRESS  
CONSUMER SERVICE CENTER  
BANKRUPTCY DIVISION (CODE 248)  
PO BOX 9146  
SAN JUAN PR 00908-0146

Midland Mtg/Midfirst  
999 Nw Grand Blvd  
Oklahoma City, OK 73118-6051

Money Express  
PO Box 11890  
San Juan, PR 00922-1890

Municipio Autonomo De Caguas  
PO Box 907  
Caguas, PR 00726-0907

SCOTIABANK  
ATTY PATRICIA VARELA  
PO BOX 192938  
SAN JUAN PR 00919-3409

Scotiabank De Puerto Rico  
290 Jesus T Pinero Ave  
Hato Rey, PR 00919

Scotiabank Of Puerto Rico  
Martinez & Torres Law Offices, P.S.C  
PO.BOX 192838  
SAN JUAN, PR 00919-2838

Syncb/Walmart  
PO Box 965024  
Orlando, FL 32896-5024

Synchrony Bank  
PO Box 960061  
Orlando, FL 32896-0061

T-mobile  
12920 Se 38th Street  
Bellevue, WA 98006-7305

TD Bank N.A.  
Attn: Bankruptcy Dept.  
ME2-002-035  
P.O. Box 9547  
Portland, ME 04112-9547

ALEJANDRO OLIVERAS RIVERA  
ALEJANDRO OLIVERAS CHAPTER 13 TRUS  
PO BOX 9024062  
SAN JUAN, PR 00902-4062

FELIX ANGEL FALCON FIGUEROA  
PO BOX 1528  
CIDRA, PR 00739-1528

MONSITA LECAROS ARRIAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

MYRNA JURADO RODRIGUEZ  
PO BOX 1528  
CIDRA, PR 00739-1528

ROBERTO FIGUEROA CARRASQUILLO  
PO BOX 186  
CAGUAS, PR 00726-0186

End of Label Matrix  
Mailable recipients 25  
Bypassed recipients 0  
Total 25